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August 6, 2009

Honorable Susan D. Wigenton  
United States District Judge  
District of New Jersey  
Martin Luther King, Jr. Federal Building  
& U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**COURTESY COPY -**  
**ORIGINAL FILED**  
**VIA ECF**

Re: United States v. Aleksandr Sirota  
08-CR-132 (SDW)

Dear Judge Wigenton:

I am writing to request a modification of the terms of bail for my client, Aleksandr Sirota, in the above-captioned case. Mr. Sirota was admitted to bail by Magistrate Judge Mark Falk of this Court on February 20, 2008. His \$500,000 bail was secured by posting his and his wife's residence in Freehold, New Jersey. Subsequently, on June 24, 2009, Your Honor accepted Aleksandr Sirota's guilty plea to Counts One through Four and the forfeiture allegation of the superseding information, which was made pursuant to a plea agreement with the government.

As a result of his plea, Mr. Sirota expects he will be incarcerated. He plans on relocating his family to Brooklyn where he is moving into a home he owns, so his wife and children will have the support of their extended families, who also reside in Brooklyn, during his incarceration. His current residence in Freehold is in contract to be sold with a scheduled closing date of August 17, 2009. As such, he is respectfully requesting that he be allowed to substitute the residence he owns at 220 Amherst Street, Brooklyn, NY 11235 for the residence at 530 Turtle Hollow Drive, Freehold, NJ 07728 to secure his bail.

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I have spoken with Assistant U.S. Attorney Anthony Moscato and U.S. Pre-Trial Services Officer Steven Casale, neither of whom oppose this request. During my conversation with AUSA Moscato, we also discussed the effect that the proposed substitution would have on the bail terms for Mr. Sirota's father, Grigory Sirota. Grigory Sirota's \$350,000 bail is also secured by his son's residence. If the Court grants the substitution, Grigory Sirota's bail will no longer be secured, which Mr. Moscato also does not oppose. Finally, I have transmitted all appropriate documents regarding the new house to Officer Casale, who is prepared to effectuate this substitution if the Court grants this request.

Thank you for Your Honor's consideration of this matter.

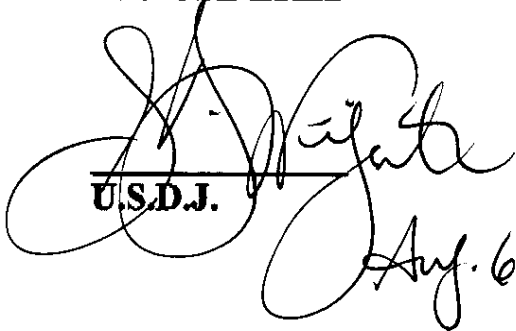
Very truly yours,



Kenneth J. Kaplan

cc: Anthony Moscato, A.U.S.A. (By ECF)  
Steven Casale, U.S.P.T.S.O. (By facsimile)  
Albert Dayan, Esq. (By ECF)

**"SO ORDERED"**

  
U.S.D.J.  
Aug. 6, 2009